

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

**LEHMAN BROTHERS HOLDINGS, et al.,**

Debtors.  
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**Chapter 11**

**Case No. 08-13555-scc**

**STIPULATION AND ORDER REGARDING BRIEFING  
SCHEDULE ON MOTIONS TO VACATE ALTERNATIVE  
DISPUTE RESOLUTION PROCEDURES ORDER  
FOR INDEMNIFICATION CLAIMS OF THE DEBTORS  
AGAINST MORTGAGE LOAN SELLERS**

WHEREAS, on February 17, 2015, Defendant Stearns Lending LLC f/k/a Stearns Lending Inc. ("Stearns") filed a Motion Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure Seeking an Order Vacating the "Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller, Stearns Lending LLC, f/k/a Stearns Lending Inc" with a hearing date of March 17, 2015;

WHEREAS, on March 30, 2015, Defendant Oaktree Funding Corporation ("Oaktree"), Gateway Bank FSB ("Gateway") and American Bank ("American Bank") filed a Motion Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure Seeking an Order Vacating the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller requesting a stay and a hearing date of May 5, 2015;

WHEREAS, on March 30, 2015, Defendant Group 2000 Real Estate Services Inc. ("Group 2000") filed a Motion Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure Seeking an Order Vacating the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller; (Stearns, Directors,

Republic, First Mortgage, Oaktree, Group 2000, Gateway, and American Bank, together, the “Defendants”) and the Defendants’ Motions, together, the “Motions to Vacate”);

WHEREAS, on March 31, 2015, Defendant Directors Mortgage (“Directors”), Republic State Mortgage (“Republic”), and First Mortgage Corporation (“First Mortgage”) each filed a Motion Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure Seeking an Order Vacating the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller requesting a stay and a hearing date of May 5, 2015;

WHEREAS Defendants and LBHI have conferred and agreed to a consolidated briefing schedule for Defendants’ Motions to Vacate;

THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and between LBHI and Defendants, by their respective and undersigned counsel, as follows:

1. The deadline for LBHI to oppose the Motions to Vacate is April 14, 2015;
3. The Defendants’ time file a reply in further support of the Motions to Vacate is April 30, 2015; and
4. The Court will hear arguments on the Motions to Vacate on May 5, 2015 at 2:00 p.m.

Dated: March 31, 2015

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*Attorneys for Directors Mortgage Company,  
Republic State Mortgage, First Mortgage*

-and-

*Corporation, Oaktree Funding Corporation,  
Gateway Bank and American Bank*

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*Counsel for Stearns Lending LLC f/k/a  
Stearns Lending Inc. and Group 2000 Real  
Estate Services Inc.*

**IT IS SO ORDERED:**

New York, New York

April 3, 2015

/s/ Shelley C. Chapman  
UNITED STATES BANKRUPTCY JUDGE